

Bradley T. Hunsicker (Wyo. Bar 7-4579)
MARKUS WILLIAMS YOUNG & ZIMMERMANN LLC
106 East Lincolnway, Suite 300
Cheyenne, WY 82001
Telephone: 307-778-8178
bhunsicker@markuswilliams.com

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

In re:)	
)	Case No.: 16-20326
POWELL VALLEY HEALTH CARE,)	Chapter 11
INC.,)	
Debtor.)	

**AGREED MOTION TO VACATE AND CONTINUE HEARING AND
RELATED DEADLINES ON DEBTOR'S DISCLOSURE STATEMENT**

Undersigned counsel for Powell Valley Health Care, Inc. (the "Debtor") hereby files this *Motion to Vacate and Continue Hearing and Related Deadlines on the Debtor's Disclosure Statement* (the "Motion"), and in support thereof would show the Court as follows:

1. On May 16, 2016 (the "Petition Date"), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the "Bankruptcy Court").

2. The Debtor has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. On April 24, 2017, the Debtor filed its Disclosure Statement in Support of Chapter 11 Plan of Reorganization dated April 24, 2017 (the “Disclosure Statement”) [Doc. 498].

4. On July 19, 2017, the Court entered its *Order Rescheduling Hearing on Approval of Disclosure Statement* [Doc. 595] wherein the Court set a hearing on approval of the Debtor’s Disclosure Statement for September 26, 2017, at 10:30 a.m. Additionally, the Court ordered that HealthTech, Mr. Patten, UMIA, Lexington and Homeland shall have up to September 19, 2017, to file an objection to the Debtor’s Disclosure Statement. Last, the Court set September 22, 2017, as the deadline to file a schedule of proposed exhibits and anticipated witnesses for the hearing on approval of the Debtor’s Disclosure Statement.

5. At this juncture, the Debtor is compiling and considering various proposed revisions to the Disclosure Statement and Plan and Plan-related documents (the “Plan Documents”) from parties in this case and anticipates making various revisions to the Plan Documents (and will file the same with the Court) on or around September 26, 2017, the current date set for hearing on approval of the Debtor’s Disclosure Statement.

6. The Debtor believes that the interests of all parties would be better served if the Debtor could focus its attention on finalizing revisions to the Plan Documents in hopes of reaching consensual resolution of all pending matters related thereto prior to having the September 26 hearing.

7. Accordingly, the Debtor requests that the hearing on the approval of the Debtor's Disclosure Statement be continued for two weeks, and set for October 10, 2017. All related deadlines and dates related thereto should also be continued for two weeks.

8. The two-week continuance will ensure that the Plan Documents can be revised appropriately, and at the same time, will ensure that the Plan confirmation process is not unnecessarily delayed.

9. The Committee, the Powell Hospital District, First Bank of Wyoming and the Insurance Companies have indicated that they do not oppose the relief requested herein.

WHEREFORE, the Debtor respectfully requests the Court enter an order substantially in the form attached hereto at Exhibit A vacating and continuing the hearing and related deadlines on approval of the Debtor's Disclosure Statement.

Dated: September 15, 2017.

**MARKUS WILLIAMS YOUNG &
ZIMMERMANN LLC**

By: /s/ Bradley T. Hunsicker
Bradley T. Hunsicker (WY Bar No 7-4579)
106 East Lincolnway, Suite 300
Cheyenne, WY 82001
Telephone: 307-778-8178
Facsimile: 307-638-1975
Email: bhunsicker@markuswilliams.com

Counsel for the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

The undersigned certifies that on September 15, 2017, a copy of the foregoing was served *electronically* upon those parties indicated below:

UMIA Insurance, Inc.:

c/o James T. Burghardt
Timothy M. Swanson
Moye White LLP
1400 16th St., 6th Floor
Denver, CO 80202
jim.burghardt@moyewhite.com
tim.swanson@moyewhite.com

c/o Julie Nye Tiedeken
McKellar, Tiedeken & Scoggin, LLC
702 Randall Avenue
P.O. Box 748
Cheyenne, WY 82003
jtiedeken@mtslegal.net

Homeland Insurance Company of NY:

Judith Studer
Patrick T. Holscher
Schwartz, Bon, Walker & Studer, LLC
141 S. Center St., Suite 500
Casper, WY 82601
(307) 235-6681
(307) 234-5099 Fax
jstuder@schwartzon.com
pat@schwartzbon.com

Charles E. Spevacek
Tiffany M. Brown
Meagher & Geer, P.L.L.P.
33 S. Sixth Street, Suite 4400
Minneapolis, MN 55402
Ph: (612) 371-1324
Fax: (612) 877-3015
cspevacek@meagher.com
tbrown@meagher.com

Lexington Insurance Company, Inc.:

Deborah M. Kellam
Hall & Evans, L.L.C.
2015 Central Ave., Suite C
Cheyenne, WY 82001
kellamd@hallevans.com

Michael S. Davis
Bryan D. Leinbach
**ZEICHNER ELLMAN & KRAUSE
LLP**
1211 Avenue of the Americas
New York, NY 10036
Tel: (212) 223-0400
Fax: (212) 753-0396

mdavis@zeklaw.com
bleinbach@zeklaw.com

**Attorneys for Official Committee of
Unsecured Creditors:**

Scott J. Goldstein
Philip A. Pearlman
Jamie N. Cotter
Spencer Fane
1000 Walnut Street, Suite 1400
Kansas City, MO 64106
1700 Lincoln Street, Suite 2000
Denver, CO 80203
sgoldstein@spencerfane.com
jcotter@spencerfane.com
ppearlman@spencerfane.com

Powell Hospital District:

Brent R. Cohen
Chad S. Caby
Lewis Roca Rothgerber LLP
1200 17th Street, Suite 3000
Denver, CO 80202-5855
ccaby@lrrc.com
bcohen@lrrc.com

First Bank of Wyoming:

Timothy L. Woznick
Dray, Dyekman, Reed & Healey, P.C.
204 East 22nd Street
Cheyenne, Wyoming 82001
Tim.Woznick@draylaw.com

/s/Bradley T. Hunsicker
Bradley T. Hunsicker